

# Federal Defenders OF NEW YORK, INC.

Southern District  
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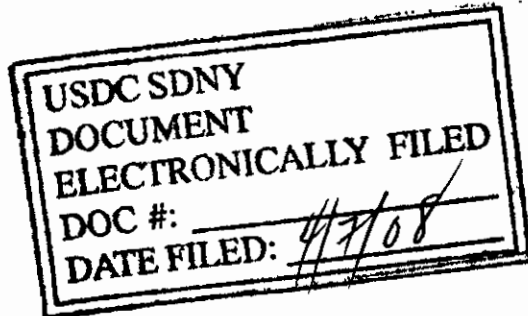
Leonard E. Joy  
Executive Director

April 7, 2008

Southern District of New York  
John J. Byrnes  
Attorney-in-Charge

**BY FAX**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007



Re: United States v. Martin Amoah  
07 Cr. 974 (LAP)

Dear Judge Preska:

I write on behalf of my client, Martin Amoah, to respectfully request that the Court modify Mr. Amoah's bail conditions. On August 21, 2007, the Honorable James C. Francis imposed the following bail conditions: (1) a \$150,000 personal recognizance bond co-signed by three financially responsible persons; (2) travel restricted to the Eastern and Southern Districts of New York; (3) surrender of any travel documents (and no new applications); and (4) strict pretrial supervision. On September 17, 2007, the Honorable Frank Maas modified Mr. Amoah's bail conditions to reduce the number of signatories on the bond to two, rather than three.

We now respectfully ask that these conditions be modified to allow Mr. Amoah to travel to the District of Columbia for business reasons between April 23, 2008 and April 26, 2008. Mr. Amoah needs to oversee the inspection of a shipment of shoes, which are scheduled to leave from Dulles Airport. I have conferred with Assistant United States Attorney David A. O'Neil, who has consented to this request on behalf of the Government. If Your Honor grants our request, I ask that Chambers contact my paralegal, Ashleigh Georgia, at 212-417-8773 as I will be out of town this week.

**SO ORDERED**

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE  
*April 7, 2008*

cc: Mr. David A. O'Neil, Esq. (by fax)

Mr. Jason Lerman  
Pretrial Services Officer (by fax)

Respectfully submitted,

*Fiona Doherty*  
Fiona Doherty  
Attorney for Martin Amoah  
(212) 417-8734